

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

NELSON CASTILLO, MARTA VALLADARES,
ARACELY VALLADARES, CARLOS REYES, and
YOSELY ESPINAL HENRIQUEZ, individually and on
behalf of all others similarly situated,

Civil Action No.

17-CV-2972(JS)(AKT)

Plaintiffs,

- against -

PERFUME WORLDWIDE INC. and PIYUSH GOLIA,

Defendants.

DECLARATION OF STEVEN J. MOSER

I, Steven J. Moser, declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, as follows:

1. I represent the Plaintiffs Nelson Castillo, Marta Valladares, Aracely Valladares, Carlos Reyes, and Yosely Espinal Henriquez.
2. ~~I make this declaration in support of Plaintiffs' Motion for an order finding that the Defendants Perfume Worldwide, Inc. and Piyush Golia, and the non-party Perfume Center of America have waived the attorney-client privilege and directing the non-parties The Scher Law Firm, LLP and Barbara Kalish to comply with the subpoenas.~~
3. Annexed hereto are true and accurate copies of the following documents:

<u>Exhibit #</u>	<u>Description</u>
1	Complaint (ECF No. 1)
2	Answer (ECF No. 8)
3	Email with the subject "Perfume Center Handbook"
4	Affidavit of Service of Subpoena upon The Scher Law Firm, LLP
5	Affidavit of Service of Subpoena upon Barbara Kalish, Esq.

The foregoing is true and correct.

Dated: March 29, 2018

/s/

Steven J. Moser